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August 28, 2024

By ECF & Email

## MEMO ENDORSED

Hon. Andrew E. Krause  
Magistrate Judge  
Southern District of New York  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150

APPLICATION GRANTED  
  
Hon. Victoria Reznik, U.S.M.J.

August 29, 2024

**Re: *United States v. Eric Kyu*, 24-MJ-02893 (UA)**

Dear Judge Krause:

This letter is respectfully submitted to request that the Court amend the conditions of Mr. Kyu's bond to permit him to reside at the home of his cousin in New Jersey with his cousin and his cousin's wife and to travel to and from New Jersey for supervised visitation with his family as directed by Child Protective Services, to attend court proceedings and to attend meetings with counsel. Under Mr. Kyu's current conditions of release his travel and residence are restricted to the Southern and Eastern Districts of New York. *See* D.E. 3, p.g. 4.

Pretrial Services Officer Andrew Abbott has spoken with Mr. Kyu's cousin and has no objection to the request noting that the move to New Jersey would provide "a more stable residence" and that the monitoring of Mr. Kyu's devices would continue. The Government has no objection to this request provided that Pretrial Services impress upon Mr. Kyu's cousin and his wife that Mr. Kyu cannot have access to any internet connected device that is not subject to monitoring by Pretrial Services. He has been so advised and will continue his strict compliance with all conditions of his release.

Thank you for your consideration.

Respectfully submitted,

/s/ James Kousouros  
James Kousouros, Esq.  
Counsel for Eric Kyu

cc: All Counsel of Record (By ECF)

Andrew Abbott  
Pretrial Services Officer